

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO, WESTERN DIVISION**

IN RE:

James Majewski
Nichole Majewski

Debtors

* Case No. 09-36626
*

* Chapter 13 Bankruptcy
*

* JUDGE WHIPPLE
*

* **MOTION FOR LEAVE TO**
* **INCUR NEW DEBT**
*

* Adrienne M. Hines (#0067248)
* Attorney for Debtors
* 502 W. Washington Street
* Sandusky, Ohio 44870
* (419) 625-7770 Phone

Now come the Debtors, James Majewski and Nichole Majewski, by and through undersigned counsel, to move this Court for leave to incur a new debt totaling approximately \$20,000.00, in order to pay out their pending Chapter 13 plan. In support of this motion, the debtor states:

1. The Debtor's employer has offered to advance the Debtor enough funds to pay out the current Chapter 13 plan. The repayment of this company loan would be made through payroll deduction..
2. In excess of 67% of the allowed debt has already been paid through the plan.
3. A payoff figure of \$19,763.41 was provided to Counsel by the Chapter 13 Trustee on July 19, 2012. In an email of the same date, the trustee's office indicated that the Chapter 13 trustee supported this proposed payoff, provided Counsel filed a motion to incur new debt.

THEREFORE, the debtor moves this Court for leave to incur the new debt described above, for the purposes of paying out the Chapter 13 plan.

Respectfully submitted,

/s/Adrienne M. Hines
Adrienne M. Hines, #0067248
Attorney for Debtors
502 W. Washington Street
Sandusky, OH 44870
(419) 625-7770

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served, via regular US Mail, upon all parties of interest, a list of which is attached hereto, on this the 20th day of July, 2012. *Notice is hereby given to all interested parties that any objection must be filed within 14-days from the date of service as set forth in this Certificate of Service.*

Respectfully submitted,

/s/Adrienne M. Hines_____

Adrienne M. Hines

SERVICE LIST

1st Source B
100 N Michigan St
P O Box 149
South Bend, IN 46601

Acs/Dept Of Ed
501 Bleecker St
Utica, NY 13501

Acs/Wachovia
501 Bleecker St
Utica, NY 13501

Alison A. Gill
Fusco, Mackey, Mathews & Gill LLP
655 Cooper Road
Westerville, OH 43081

Allied Waste Services
4005 Tiffin Avenue
Sandusky, OH 44870

Ar Resources
1777 Sentry Pkwy West
Blue Bell, PA 19422

Bank Of America
Po Box 17054
Wilmington, DE 19850

Bill Me Later
PO Box 2394
Omaha, NE 68103-2394

Cap One
Pob 30281
Salt Lake City, UT 84130

Carecrd/Gemb
Po Box 981439
El Paso, TX 79998

Chase
800 Brooksedge Blv
Westerville, OH 43081

Chase Student Ln Servi
Po Box 6004
Ridgeland, MS 39158

Chrysler
27777 Franklin Rd
Southfield, MI 48034-2337

Citifinancial
Po Box 499
Hanover, MD 21076

Columbia Gas
Revenue Recovery
200 Civic Center Drive
Columbus, OH 43215

Elizabeth Alphin
Mapother & Mapother P.S.C.
815 West Market Street
Suite 500
Louisville, KY 40202

Everst University
C/O Corinthian Colleges, Inc
Attn: Financial Services
PO box 25117
Santa Ana, CA 92799

Fifth Third Bank
PO Box 829009
Dallas, TX 75382-9009

Gemb/Dillard
Po Box 981471
El Paso, TX 79998

HSBC Bank Nevada N.A.
Bass & Associates, P.C.
3936 E. Ft.Lowell Road,
Ste 200
Tucson, AZ 85712

Hsbc/Kawas
Pob 15521
Wilmington, DE 19805

Hsbc/Rs
90 Christiana Rd
New Castle, DE 19720

Kay Jewelers
375 Ghent Rd
Akron, OH 44333

Ntl Bk Oakhb
147 W Water
Oak Harbor, OH 43449

Sallie Mae
1002 Arthur Dr
Lynn Haven, FL 32444

Sallie Mae
11100 Usa Parkway
Fishers, IN 46038

Stacey A. O'Stafy
Manley Deas Kochalski LLC
P.O. Box 165028
Columbus OH 43216-5028

Village of Oak Harbor
Utilities Department
146 N. Church Street
Oak Harbor, OH 43449-0232

Wfnnb/Vctria
Po Box 182128
Columbus, OH 43218